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2	KIMBERLY MAXSON-RUSHTON Nevada Bar #005065	
-	COOPER LEVENSON APRIL	
3	NIEDELMAN & WAGENHEIM, P.A.	/
4	900 South Fourth Street	
4	Las Vegas, Nevada 89101 (702) 366-1125	
5	FAX: (702) 366-1857	
	Attorneys for Defendant	
6	ON DEMAND SEDAN SERVICES, LLC dba ODS LIMOUSINE and ODS CHAUFFEURED	
7	TRANSPORTATION	
0	HATTED CTATED	DISTRICT COLIDT
8	UNITEDSIATED	DISTRICT COURT
9	DISTRICT	OF NEVADA
10	THEODORE TRAPP, on his own behalf and	CASE NO. 2:09-cv-00995
	on behalf of all others similarly situated,	Olish 1(0. 2.0) 01 00))3
L1	D1 :	
12	Plaintiff,	DEMAND FOR SECURITY OF COSTS
	vs.	D / CII : 37/4
13		Date of Hearing: <u>N/A</u> Time of Hearing: N/A
[4	BIG POPPA'S, LLC, a Nevada limited liability company d/b/a BADDA BING	Time of Hearing. <u>IN/A</u>
	MEN'S CLUB; SKY TOP VENDING, INC.,	,
15	a Nevada Corporation d/b/a CAN CAN	
16	ROOM; LA FUENTE, INC., a Nevada corporation d/b/a CHEETAS'S; C.P. FOOD	,
	AND BEVERAGE, INC., a Nevada	
L7	corporation d/b/a CLUB PARADISE; DÉJÀ	
18	VU SHOWGIRLS OF LAS VEGAS, LLC, a Nevada limited liability company d/b/a DÉJÀ	
	VU SHOWGIRLS; PALOMINO CLUB,	
19	INC., a Nevada corporation d/b/a PALOMINO	
20	CLUB; SHAC, LLC, a Nevada limited liability company d/b/a SAPPHIRE; K-KEL,	
	INC., a Nevada corporation d/b/a	
21	SPEARMINT RHINO; D2801 WESTWOOD,	
22	INC., a Nevada corporation d/b/a TREASURES; LITTLE DARLINGS OF LAS	
	VEGAS, LLC, a Nevada limited liability	
23	company d/b/a LITTLE DARLINGS; O.G.	
24	ELIADES, A.D., LLC, a Nevada limited liability company d/b/a OLYMPIC	•
	GARDENS; LAS VEGAS	
25	ENTERTAINMENT, a Nevada limited	
26	liability company d/b/a LARRY FLYNT'S	
ן טיי	HUSTLER ĈLUB; MICHAEL A. SALTMAN d/b/a MINXX; RICK'S LAS VEGAS; FRIAS	
27	MANAGEMENT, LLC, a Nevada limited	
,	liability company d/b/a ACE CAB	·

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CAB: WESTERN CAB COMPANY, a
    Nevada corporation d/b/a WESTERN CAB
    COMPANY and WESTERN LIMOUSINE;
    NEVADA CHECKER CAB
    CORPORATION, a Nevada corporation d/b/a
    CHECKER CAB COMPANY: NEVADA
    STAR CAB CORPORATION, a Nevada
    corporation d/b/a STAR CAB COMPANY:
   NEVADA YELLOW CAB CORPORATION,
    a Nevada corporation d/b/a YELLOW CAB
    COMPANY; LUCKY CAB COMPANY OF
   NEVADA, a Nevada corporation d/b/a
   LUCKY TRANS; SUN CAB, INC., a Nevada
    corporation d/b/a NELLIS CAB COMPANY;
    CLS NEVADA, LLC, a Nevada limited
    liability company d/b/a CLS
   TRANSPORTATION LAS VEGAS; ON
    DEMAND SEDAN SERVICES, LLC, a
   Nevada limited liability company d/b/a ODS
10 |
   LIMOUSINE and ODS CHAUFFEURED
   TRANSPORTATION: BLS LIMOUSINE
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    SERVE OF LAS VEGAS; DESERT CAB,
   INC. a Nevada corporation d/b/a DESERT
12
    CAB COMPANY and ODYSSEY
   LIMOUSINE; BELL TRANS A NEVADA
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    CORPORATION, a Nevada corporation d/b/a
   BELL TRANS; TONY CHONG, and
   individual; and DOE EMPLOYEES 1-1000;
15
                Defendants.
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          THEODORE TRAPP, Plaintiff; and
   TO:
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   TO:
          JAY EDELSON, ESQ., RAFEY S. BALABANIAN, ESQ., and JAMES E. SMYTH,
19
         ESQ., Attorneys for Plaintiff;
20
          Pursuant to NRS 18.130, ON DEMAND SEDAN SERVICES, LLC dba ODS LIMOUSINE
21
   and ODS CHAUFFEURED TRANSPORTATION hereby makes demand upon Plaintiff, who resides
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   out of State, for security in the amount of Five Hundred and No/100 Dollars ($500.00) for costs and
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   charges which may be awarded herein against Plaintiff. The requirements of NRS 18.130 apply to
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   actions in the United States District Court.
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1	District of Nevada. <u>Truck Ins. Exchange</u> , 683 F. Supp. 223, 227-28 (D. Nev. 1988); <u>Hamar v.</u>
2	Hyatt Corp., 98 F.R.D. 305, 305-06 (D. Nev. 1983).
3	
4	Dated this 13 day of June, 2009.
5	COOPER LEVENSON APRIL
6	NIEDELMAN & WAGENHEIM, P.A.
7	By Krokushton
8	Kimberly Maxson-Rushton
9	Nevada Bar No. 005065 900 South Fourth Street
10	Las Vegas, Nevada 89101 Attorneys for Defendant
11	ON DEMAND SEDAN SERVICES, LLC dba ODS LIMOUSINE and ODS CHAUFFEURED
12	TRANSPORTATION
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2	<u>CERTIFICATE OF SERVICE</u>		
	Pursuant to FRCP 5 (b), I certify that I am an employee of COOPER LEVENSON APR		
3	NIEDELMAN & WAGENHEIM P.A. and that on this 24th day of 1,2009, I		
4	did cause a true copy of the foregoing DEMAND FOR SECURITY OF COSTS to be served via		
5	CM/ECF electronic filing upon the following person(s).		
6			
7	Jay Edelson Kamber Edelson LLC		
8	350 N LaSalle St, Ste 1300 Chicago, IL 60654		
9	312-589-6370		
10	Rafey S. Balabanian KamberEdelson LLC		
-	350 North LaSalle Street		
11	Suite 1300 Chicago , IL 60654		
12	(312) 589-6370 Fax: (312) 589-6378		
13	Email: rafey@kamberedelson.com		
14	James E Smyth		
15			
16	7th Floor Las Vegas, NV 89109		
17	(702) 792-7000 Fax: (702) 796-7181		
18	Email: jsmyth@kkbrf.com		
19	By Milley Emplein		
	An Employee of		
20	COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM, P.A.		
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